

## STATE OF WASHINGTON

## DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT Energy Policy Division

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August 5, 2004

Mr. Stan Price, Chair State Building Code Council – WA CTED 906 Columbia St. SW P.O. Box 42525 Olympia WA 98504-2525

Re: Analysis of Energy Building Code Improvements

Dear Mr. Price:

The Department of Community, Trade and Economic Development's Energy Policy Division contracted with Ecotope to perform an analysis of the energy savings potential in the amendments proposed to the energy code in 2003. The agency contracted for this analysis in support of the Governor's request to the State Building Code Council to reconsider their November 2003 vote that rejected all the proposed amendments. The motion that passed at the Council's June 2004 meeting indicates that the Council selected those amendments with high energy savings potential to be forwarded for consideration during the rulemaking process. While we appreciate the intent of the motion and the willingness of the Council to reconsider four of these amendments, the reality is that the Council's motion puts forth the amendments representing all of the natural gas savings, but excludes measures that achieve approximately 68% of the electricity savings included in the total package. We share this analysis now in the event there is still an opportunity to include these other measures in the rulemaking.

Our analysis indicates that the following proposed amendments, which were not forwarded for the rulemaking process, represent the majority of the savings in the electricity sector or 8.5 million kWhs of annual savings:

- Economizers (11.3% of the electricity savings from the 2003 total package of amendments),
- Lighting controls (9.5%),
- Lighting power density (19.2%),
- Transformers (10.5%), and
- Variable air volume efficient terminal fans (18.4%).

Given the critical role affordable energy service fills in Washington's economy it is unfortunate and ultimately costly that we may miss this opportunity to increase the energy efficiency of Washington's new commercial buildings.

We thank you and the other State Building Code Council members for considering the attached analysis.

Sincerely,

/s/ TU: Approved for signature

Tony Usibelli Director, Energy Policy Division

cc: Tim Nogler, Assistant Director, State Building Code Council